

LETITIA JAMES
ATTORNEY GENERAL

DIVISION OF SOCIAL JUSTICE CIVIL RIGHTS BUREAU

July 26, 2022

By Electronic Filing

Hon. Gabriel W. Gorenstein, U.S.M.J. United States District Court, Southern District of New York Daniel Patrick Moynihan Courthouse, 500 Pearl Street New York, New York 10007

Re: In re: New York City Policing During Summer 2020 Demonstrations,

No. 20-CV-8924

This Letter is Related to All Cases

Dear Judge Gorenstein:

I write regarding the Court-ordered sanction of plaintiffs' attorney's fees issued on May 16, 2022, ECF No. 541, to confirm that the parties have now settled counsel's entitlement to fees for bringing the ARGUS discovery issue to the Court's attention. Consistent with Docket Number 317, I sent a draft of this letter more than 24 hours ago, at 10:02 A.M. on July 25, 2022, and have not received a response or a request for more time to consider the same.

First, we ask for an order confirming Defendants' agreement to pay \$8,315.00 to the Office of the New York State Attorney General, counsel for *People*; \$1,305.00 to Cohen & Green, counsel for *Sow*; \$332.50, to the New York Civil Liberties Union Foundation, counsel for *Payne* plaintiffs; and \$95.00 to Rob Rickner PLLC, counsel for *Sierra*.

Second, we ask the Court to fix a date for payment to 45 days from today, September 9, 2022. We thank the Court for its time and consideration.

Sincerely,

/s/ Lillian M. Marquez

Lillian M. Marquez Assistant Attorney General, Civil Rights Bureau Office of the New York State Attorney General 28 Liberty Street

New York, New York 10005

Tel: 212-416-6401 | lillian.marquez@ag.ny.gov

CC: All counsel of record